

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

LAKEISHA MONTGOMERY,

Plaintiff,

vs.

**QUALITY PACKAGING SPECIALIST
INTERNATIONAL, LLC,**

Defendant.

)
) **Case No. 3:22-CV-03098**
) **CJRA Track: Track C**
) **Mandatory Mediation: Yes**
) **Presumptive Trial Month: July 2024**
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**JOINT REPORT OF PARTIES AND
PROPOSED SCHEDULING AND DISCOVERY ORDER**

Pursuant to Federal Rule of Civil Procedure 26(f) and SDIL-LR 16.2(a), an initial conference of the parties is scheduled for 4/11/2023 with attorneys for the parties to participate.

SCHEDULING AND DISCOVERY PLANS WERE DISCUSSED AND AGREED TO AS FOLLOWS:

1. A stipulation selecting a mediator shall be filed with the Court by 5/8/2023 (no later than **28 days** following the Scheduling and Discovery Conference).
2. Initial interrogatories and requests to produce, pursuant to Federal Rules of Civil Procedure 33 and 34 shall be served on opposing parties by 6/16/2023.
3. Plaintiff's deposition shall be taken by 9/1/2023.
4. Defendant's deposition shall be taken by 11/3/2023.
5. Motions to amend the pleadings, including the commencement of a third-party action, shall be filed by 7/7/2023 (no later than **90 days** following the Scheduling and Discovery conference).

6. Expert witnesses shall be disclosed, along with a written report prepared and signed by the witness pursuant to Federal Rule of Civil Procedure 26(a)(2), as follows:
 - Plaintiff's expert(s): 11/17/2023.
 - Defendant's expert(s): 12/22/2023.
 - Third Party expert(s): Click or tap to enter a date..
7. Depositions of expert witnesses must be taken by:
 - Plaintiff's expert(s): 1/15/2024.
 - Defendant's expert(s): 2/2/2024.
 - Third Party expert(s): Click or tap to enter a date..
8. The parties **CERTIFY** that they have discussed, in particular, the proportionality of discovery, the burden and expense associated with discovery, and the discovery of electronically stored information (ESI). The parties do not anticipate a need for ESI protocol. The parties shall submit to the Court any joint proposed ESI protocol no later than Click or tap to enter a date. (The protocol shall contain mechanisms for addressing necessary topics concerning ESI to include sources of information, search terms, format of production and preservation of ESI by both Plaintiff(s) and Defendant(s)).
9. The **Mandatory Mediation Session** shall be completed by 1/23/2024 (no later than **30 days** before the discovery cut-off).
10. **Discovery** shall be completed by 2/22/2024 (no later than **130 days** before the first day of the month of the presumptive trial month or the first day of the month of the trial setting). Any written interrogatories or request for production served after the date of the Scheduling and Discovery Order shall be served by a date that allows the served parties the full **30 days** as provided by the Federal Rules of Civil Procedure in which to answer or produce by the discovery cut-off date.
11. The **Mandatory Mediation Process** shall be completed by 3/8/2024 (no later than **15 days** after the discovery cut-off).
12. All **dispositive motions** shall be filed by 3/22/2024 (no later than **100 days** before the first day of the month of the presumptive trial month or the first day of the month of the trial setting). Dispositive motions filed after this date will not be considered by the Court.
13. The parties are reminded that, prior to filing any motions concerning discovery, they must first meet and confer relating to any discovery disputes and then contact

the Court to arrange a telephone discovery dispute conference if they are unable to resolve their dispute. If the dispute cannot be resolved in the first telephonic conference, the Court will establish, with the input of the parties, the mechanism for submitting written positions to the Court on an expedited basis.

DATED: 4/3/2023

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